UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

MAUNE RAICHLE HARTLEY

FRENCH & MUDD, LLC

Clayton L. Thompson, Esq.

cthompson@mrhfmlaw.com

Suzanne M. Ratcliffe, Esq.

sratcliffe@mrhfmlaw.com

150 West 30th Street, Suite 201

New York, New York 10001

Tel: (800) 358-5922

Attorneys for Mesothelioma Claimants Katherine Tollefson, Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin

Kathy Byrne, Esq. kbyrne@cooneyconway.com

COONEY & CONWAY

120 N. LaSalle Street, Suite 3000

Chicago, Illinois 60602

Tel: (312) 236-6166

Attorneys for Mesothelioma Claimant Giovanni

Sosa

*Admitted Pro Hac Vice

LEX NOVA LAW, LLC

E. Richard Dressel, Esq.

rdressel@lexnovalaw.com

10 E. Stow Road, Suite 250

Marlton, New Jersey 08053

Tel: (856) 382-8211

Attorneys for Mesothelioma Claimants

Evan Plotkin and Giovanni Sosa

DEAN OMAR BRANHAM SHIRLEY, LLP

J. Bradley Smith, Esq.

Bsmith@dobslegal.com

302 N. Market Road

Suite 300

Dallas, Texas 75202

Tel: (214) 722-5990

Attorneys for Mesothelioma Claimant Evan

Plotkin

*Admitted Pro Hac Vice

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

| In re: |) |
|---------------------|------------------------------|
| |) |
| LTL MANAGEMENT LLC, |) Lead BK Case: 23-12825-MBK |
| |) |
| Debtor. |) |

AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' MOTION TO DISMISS THE SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT

The Ad Hoc Group Mesothelioma Claimants,¹ through undersigned counsel and pursuant to Section 1112(b) of the Bankruptcy Code and Rule 9011 of the Bankruptcy Rules, respectfully moves this Court to Dismiss LTL Management's Petition. In support of this Motion, the Ad Hoc Group adopts and incorporates by reference all the arguments advanced in the Motion to Dismiss filed by the Official Committee of Talc Claimants (Dkt. 286-1).

Respectfully submitted:

MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC

/s/ Clayton L. Thompson
Clayton L. Thompson, Esq.
cthompson@mrhfmlaw.com
MAUNE RAICHLE HARTLEY
FRENCH & MUDD, LLC

¹ The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin, all mesothelioma claimants.

150 W. 30th Street, Suite 201 New York, NY 10001 (800) 358-5922 Attorneys for Mesothelioma Claimants Katherine Tollefson, Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin

COONEY & CONWAY

<u>/s/ Kathy Byrne</u>

Kathy Byrne, Esq. kbyrne@cooneyconway.com 120 N. LaSalle Street, Suite 3000 Chicago, Illinois 60602

Tel: (312) 236-6166

Attorneys for Mesothelioma Claimant Giovanni Sosa

*Admitted Pro Hac Vice

DEAN OMAR BRANHAM SHIRLEY, LLP

/s/ J. Bradley Smith

J. Bradley Smith, Esq. Bsmith@dobslegal.com 302 N. Market Road Suite 300

Dallas, Texas 75202

Tel: (214) 722-5990

Attorneys for Mesothelioma Claimant Evan Plotkin

*Admitted Pro Hac Vice

LEX NOVA LAW, LLC

/s/ E. Richard Dressel

E. Richard Dressel, Esq. rdressel@lexnovalaw.com 10 E. Stow Road, Suite 250 Marlton, New Jersey 08053

Tel: (856) 382-8211

Attorneys for Mesothelioma Claimants Evan Plotkin and Giovanni Sosa